## REMARKS

This Amendment, submitted in response to the Office Action dated March 19, 2008, is believed to be fully responsive to each point of rejection raised therein. Accordingly, favorable reconsideration on the merits is respectfully requested.

Claims 1, 5, and 14-18 are all the claims pending in the application. Claims 1, 5, 14, 15 and 18 have been amended.

### I.      Specification

Applicant respectfully submits to the Examiner that the objections to the Specification are moot in view of self-explanatory amendments to claim 5 presented above.

### II.      Claim Rejections under 35 U.S.C. § 101

Applicant respectfully requests the Examiner withdraw the rejection to claim 5 under 35 U.S.C. § 101 in view of the self-explanatory amendments presented above.

### III.      Claim Rejections under 35 U.S.C. § 103

**Claims 1, 5, and 18**

Claims 1, 5, and 18 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Nguyen et al., (U.S. Patent No. 6,377,354), in view of Oliver et al., ("Sams Teach Yourself HTML and XHTML in 24 Hours"). Applicant respectfully traverses the rejection.

Claim 1 recites, *inter alia,*

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        performing control, . . ., such that processing
to form images is executed after completing processing
to determine coordinate positions for all objects in
the entire document
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In the Office Action, the Examiner asserted that Nguyen teaches or suggests the above recited limitation of the claims. However, Applicant respectfully disagrees.

In column 7, lines 37-41, Nguyen discloses "the printing of a document requires many print calls to be processed by the printer driver, and hence the **functional flow described in FIGS. 3A and 3B will be processed multiple times in the printing of a single document**."

Applicant respectfully submits that, as can be seen from the above quoted statement, when two print-calls, A and B, are called in order during the processing of one document, Nguyen first determines whether or not print-call A has an overlap, and if it has an overlap, forms an image in which the overlapped object is merged; and if print-call A does not have any overlap, forms an image of each object. Next, Nguyen determines whether or not print-call B has an overlap, and if it has an overlap, merges the overlapped object; and if print-call B does not have any overlap, forms an image for each object. **Therefore, when determining that print-call A has an overlap, Nguyen forms an image of the overlapped object before the print-call B is called** (i.e., before determining the coordinate position of an object whose image is formed in print-call B). Consequently, processing to form images is <u>not</u> executed after completing processing to determine coordinate positions <u>for all objects in the entire document</u>. As such, Applicant respectfully submits that Nguyen fails to teach or suggest all the limitations of the claims. Applicant further respectfully submits that Oliver clearly fails to supplement for the deficiencies of Nguyen.

Accordingly, Applicant respectfully submits that claim 1 would not have been obvious under 35 U.S.C. § 103(a) over Nguyen in view of Oliver, because the references, alone or in combination, do not teach or suggest all of the features and limitations of the claims. Accordingly, Applicant respectfully requests the Examiner to withdraw the rejection of claim 1.

Applicant further respectfully submits independent claims 5 and 18 are patentable over

the cited combination for similar reasons. Accordingly, Applicant respectfully requests the

Examiner to withdraw the rejection of claims 5 and 18.

**Claims 14-17**

Claims 14-17 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable

over Nguyen et al., (U.S. Patent No. 6,377,354), and further in view of W3School, ("HTML

Tutorial: Welcome to HTML School"). Applicant respectfully traverses the rejection.

Above, Applicant pointed out that Nguyen is deficient vis-à-vis independent claim 1.

Applicant respectfully submits that the teachings of Nguyen are deficient regarding independent

claims 14 and 15 for similar reasons. Further, Applicant respectfully submits that clearly

W3School fails to compensate for the deficiencies of Nguyen. Even taken for what they would

have meant as a whole to an artisan of ordinary skill, the combined teachings of these two

references would not have (and could not have) led the artisan of ordinary skill to the subject

matter of independent claims 14 or 15.

Therefore, claims 14 and 15 would not have been obvious within the meaning of 35

U.S.C. §103(a). Additional, untaught modifications would have been necessary.

Accordingly, Applicant respectfully requests that the Examiner withdraw the rejection of

claims 14 and 15 and claims 16 and 17 at least by virtue of their dependency from claims 14 and

15.

**IV.    Conclusion**

In view of the above, reconsideration and allowance of this application are now believed

to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue

Fee and the Publication Fee, to Deposit Account No. 19-4880.  Please also credit any

overpayments to said Deposit Account.

Respectfully submitted,


/Logan J. Brown 58,290/
SUGHRUE MION, PLLC                  Logan J. Brown
Telephone: (202) 293-7060           Registration No. 58,290
Facsimile: (202) 293-7860

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